IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 16-22 Erie
	)	
BRENT LOCKWOOD	)	(18 U.S.C. §§ 2423(b), 2423(e),
	)	2252(a)(2), 2252(b)(1),
	)	2252(a)(4)(B) and 2252(b)(2))

FILED
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U.S. DISTRICT COURT

SUPERSEDING INDICTMENT

The grand jury charges:

In and around May 2016, the defendant, BRENT LOCKWOOD, a United States citizen, traveled in interstate and foreign commerce, from Allegheny County, within the Western District of Pennsylvania, to the Philippines, for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person and did attempt to do so.

In violation of Title 18, United States Code, Sections 2423(b) and 2423(e).

COUNT TWO

The grand jury further charges:

From in and around June 2009 to in and around June 2016, in the Western District of Pennsylvania, the defendant, BRENT LOCKWOOD, did knowingly receive, and attempt to receive, visual depictions of a minor that had been shipped and transported in interstate commerce, specifically by computer, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THREE

The grand jury further charges:

From in and around June 2009 to in and around June 2016, in the Western District of Pennsylvania, the defendant, BRENT LOCKWOOD, did knowingly possess, and attempt to possess, visual depictions, namely, visual images and movies in individual computer files, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, all of which had been shipped and transported in interstate and foreign commerce, by means of a computer.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATIONS

1. The grand jury re-alleges and incorporates by reference the allegations contained in Counts One, Two and Three of this Superseding Indictment for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 2253(a)(3).

2. As a result of the commission of the violations charged in Counts One and Two of this Indictment, the defendant, BRENT LOCKWOOD, did use the following to commit or to promote the commission of said violations:

a) HP Desktop computer bearing serial number 4CE2440B7J

b) HP Desktop computer bearing serial number MXK34507MJ

c) Toshiba Laptop bearing serial number 5A016814W

d) Acer Desktop computer bearing serial number 257886.00/03169625AQ

e) Samsung Galaxy S3 cellphone bearing serial number R21C72WJV6F

A True Bill,

FOREPERSON

SOO C. SONG
Acting United States Attorney
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